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THE HONORABLE ROBERT S. LASNIK

06-CV-00697-ORD

JUDGE'S COPY

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6
7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 MIKE KREIDLER, Insurance Commissioner for
11 the State of Washington and as Receiver for
12 Cascade National Insurance Company, in
Liquidation,

13 Plaintiff,

14 v.

15 DANNY L. PIXLER and ROXANN PLXLER,
16 individually and their marital community;
17 ANTHONY HUFF and SHERI HUFF,
18 individually and their marital community;
19 AMERICAN STAFF RESOURCES OF
20 CALIFORNIA, INC., a Delaware corporation;
21 CERTIFIED SERVICES, INC., a Nevada
corporation; MIDWEST MERGER
22 MANAGEMENT, LLC, a Kentucky Limited
Liability Company; and JOHN DOES 1 – 10,

Defendants.

NO. C06-697 RSL

~~PROPOSED~~ ORDER ESTABLISHING A
DISCOVERY PLAN

23 THIS MATTER having come on before the Court on Plaintiff's Motion for Order
24 Establishing Discovery Plan, and the Court having considered the records and files herein and
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~~PROPOSED~~ ORDER ESTABLISHING A DISCOVERY PLAN

the pleadings of the parties submitted on the matter, and having determined that a discovery plan should be entered in this case, and being otherwise duly advised in the premises, now therefore,

IT IS HEREBY ORDERED AS FOLLOWS:

1. Plaintiff's Motion is granted.

2. Prior to commencing depositions, the parties shall complete document production and responses to the written discovery which has been served to date in this action. The parties shall timely respond and answer, and shall confer within a reasonable period of time as to any disagreements or disputes, which disputes and conferences shall be completed no later than the middle of August, 2007. If the parties cannot reach agreement, either party may promptly file a motion.

3. Depositions shall be scheduled by mutual, good faith cooperation and agreement. They shall commence no earlier than the end of August, provided the documents have been produced as agreed or as ordered. Depositions of the initially listed deponents (24) shall be completed by the end of November, 2007.

4. No deposition of Insurance Commissioner Mike Kreidler shall be held until there is either an agreed order or an order of the Court.

5. Following completion of the initial wave of the 24 depositions, the parties may each seek additional written discovery or document production from other parties or third parties; or may seek additional depositions. If the parties disagree on any matters, after conferring, either party may bring the issue before the Court.

[PROPOSED] ORDER ESTABLISHING A DISCOVERY PLAN

6. Expert disclosures are due March 12, 2008. Following the expert reports, additional discovery and/or depositions of experts shall be set by mutual agreement of the parties and the experts' schedules.

7. The discovery deadline is May 11, 2008; dispositive motion deadline is June 10, 2008, and trial date is September 8, 2008.

DATED this 27th day of July, 2007.



THE HONORABLE ROBERT S. LASNIK

Presented by:

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MALANCA, PETERSON & DAHEIM LLP

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~~PROPOSED~~ ORDER ESTABLISHING A DISCOVERY PLAN

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~~PROPOSED~~ ORDER ESTABLISHING A DISCOVERY PLAN

PAGE 4 of 4
No. C06-697 RSL
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